



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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November 30, 1998

Ms. Cynthia Stewart
Airport Manager
King County International Airport
P. O. Box 80245
Seattle, WA 98108

Subject: Review of the "Environmental Impact Statement (EIS) for the Master Plan Improvements at King County International Airport/Boeing Field"

Dear Ms. Stewart:

Thank you for the opportunity to comment on the "Environmental Impact Statement (EIS) for the Master Plan Improvements at King County International Airport/Boeing Field (KCIA)."

General

We commend King County for making the Threshold Determination under the State Environmental Policy Act (SEPA) for the Master Plan improvements at KCIA. Based upon our review of the scoping document, the Master Plan improvement will have direct, indirect, and cumulative impacts issues that need to be addressed. Specific environmental impacts that need to be fully addressed including but not limited to short-term and long-term effects of noise, vibration, air pollution, traffic, and contaminated site identification and cleanups for each alternative. The environmental impact analysis should include those impacts that currently exist and are likely to arise or exist in the future. This is particularly important with the current use of Boeing Field as both a flight test operations base for new aircraft development and design, and as a delivery base for new aircraft where customer acceptance testing and systems check out operations are conducted.

We once again recommend that KCIA invite affected agencies to be involved in a technical working group that would meet regularly during the EIS/Master plan development process.

In assessing the significance of an impact, KCIA should not limit consideration of the proposal to only those aspects within the airport boundaries. A cumulative effects analysis, which addresses area wide community and environmental impacts, needs to be included. This is particularly important in addressing noise impacts. The FAA rules require that KCIA traffic approaches remain below the flight paths used by SeaTac International Airport. Impacts of air traffic arriving



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at KCIA has a significant impact on those communities immediately adjacent to the airport boundaries and for the City of Seattle as a whole.

Mission Goals and Assumptions

In the draft concept document for the masterplan a mission statement and a series of goals and assumptions were discussed. The current status of the Mission statement and the goals and assumptions that are being used by the Airport for its planing efforts needs to be articulated in the EIS analysis. Additionally, each of the alternatives needs to be compared to the mission, goals and assumptions statements for their ability to meet the Airport's objectives.

Alternatives

The alternatives that will be developed in the EIS are not well described in the scoping document. A reasonable range of alternatives for KCIA does not appear to have been developed. Some of the alternatives presented in the scoping documents would appear to look at regional impacts of KCIA. The alternative should also look more specifically at operational configurations at KCIA. For example, it is not clear what is meant by "alternatives at King County Airport." Is this the preferred alternative that would increase the length of the runway or is this one alternative that looks at different operational configurations at KCIA? If the later is the case then this alternative should be broken into several alternatives. One alternative that should be included is one that shortens the runway 800 feet in order to provide more safety area which in turn meets FAA safety requirements. Ecology supports the inclusion of a community alternative in the EIS.

Contamination/Cleanup Issues

In our review of the Masterplan Concept document we provided extensive comments on the need to identify and address contaminated sites. The scoping information does not specifically address contamination issues at Boeing Field. The major issues that would need to be addressed in the EIS include the location of the new Fuel Farm and the Airport shop and the old location of both these facilities. These operations need to be examined for contamination and cleanup as appropriate.

There may be some volatile organic compound (VOC) contamination at the Boeing facility that needs to be identified and addressed in each of the alternatives especially where there are any re-development plans. Regardless of whether or not existing contamination will be unearthed during excavation, it is prudent to assess the condition of probable contaminated areas that will not be excavated. This is necessary to see if other remedial measures will be necessary in these areas, for protection of groundwater and surficial soil contact (human health issues and is required under the MTCA to protect human health and the environment. There are thirteen contaminated sites at the Airport, which have been reported to the Department of Ecology. Other potential contaminated sites need to be identified as a part of the environmental analysis.

The current status of groundwater needs to be assessed where there is a reasonably suspected source of contamination. Examples would be chlorinated solvents, jet fuels, diesel fuel, metals, electroplating solvents and PAHs, which are often found as common contaminants in and around airports.

Cleanup issues between the Georgetown Steam Plant and the Boeing property line need to be assessed as there could be an exceedence of the Model Toxics Control Act (MTCA) polychlorinated biphenyl (PCB) cleanup standard, as evidenced by an excavation sidewall sample taken in this area. The Georgetown Plant conducted a PCB cleanup, up to the property line of Boeing. Boeing has done some additional investigations in the area and complete documentation should be included in the EIS.

Cost estimates should include remedial measures necessary for the protection of groundwater and surficial soil contact. Cost estimates need based on all of the contaminants of concern.

Other than in excavated areas, a contingency cost estimate and disposal costs for remediation need to be addressed for each alternative where established and/or new cleanup sites will require remediation. As we stated in our comments on the draft concept document there is no way to correlate site characterization costs to cleanup costs. The environmental analysis needs to clarify if a threat to human health and the environment exists, by determining which contaminants are present and if pathways for exposure exist, potential for migration to groundwater, etc. Contaminated soils, adjacent to utility corridor placement and not remediated, could enter those corridors. Utility corridors can act as preferential pathways for the further migration of contaminants.

Air Quality Conformity

In the general area of air quality the US Environmental Protection Agency (EPA) established health-based standards called National Ambient Air Quality Standard (NAAQS) for "criteria" pollutants: carbon monoxide, sulfur dioxide, particulate matter (PM10 and PM2.5), ozone, lead, and nitrogen dioxide in 19XX.

The Duwamish area, including the airport, is currently designated non-attainment for the PM10 NAAQS. This standard has been changed with the implementation of the new PM2.5 NAAQS, however, the old designation remains in effect until pending actions are completed by the US EPA. The framework for returning the area to attainment is contained in the State Implementation Plan (SIP).

The Puget Sound area was recently redesignated to attainment for ozone and carbon monoxide NAAQS. Therefore, the area has become what is termed a maintenance area; meaning that efforts must continue which will maintain the area in compliance with the standards for these pollutants. Maintenance plans for keeping the Puget Sound area clean of these pollutants for twenty years have been approved and are part of the SIP.

The EIS needs to establish the baseline air quality at KCIA and then to address the expected changes for each alternative to demonstrate there will be no violations of air quality standards. This may be accomplished through inventories, modeling and/or sampling studies. Available models address typical airport flight operations and ground transportation. The non-typical operations at KCIA, such as the Boeing Company activities associated with new aircraft delivery and flight certification testing must be included in any assessment of KCIA air quality.

Transportation & General Conformity apply in both non-attainment and maintenance areas.

Transportation Conformity analysis should address the following:

1. The EIS should examine the traffic impacts of the project on the regional transportation system. Transportation Conformity would be triggered if there are any improvements to regional surface transportation system that are needed as a result of this project, e.g., intersection improvements, new intersections, modifications to the I-5 access ramps, traffic lights, a merge lane added to an arterial.
2. Data needs include: existing and projected traffic volumes on the transportation system with and without the project; mode splits of people using airport with and without the project, e.g., % SOV, % carpooling, % transit;

General Conformity analysis should address the following:

1. General Conformity would be triggered if there is a federal action involved, such as FAA approval of the project or federal funding.
2. Data needs include: existing and projected on-site traffic activity with and without the project, e.g., employee and customer parking lots, service vehicle activity, sources of emissions that are not covered by other air permits.

Associated data needs that would be useful to have in the EIS:

1. Land use impacts, e.g., are any of the changes being proposed as a result of a proposed expansion of an air port related business, (e.g. Boeing) or to attract new airport related businesses, e.g., creation or improvement of an industrial park on the site. (This might not be subject to general conformity but it would be useful to have in the EIS and would make sure the traffic estimates were accurate.)

Water Quality Issues

Each of the alternatives needs to address the following:

De-icing facilities will require dedicated collection and treatment system which will prevent de-icing agents from contaminating stormwater. Discharges of de-icing wastewater into sanitary

Ms. Cynthia Stewart
Page 5
November 30, 1998

sewer will need to be permitted by King County's Industrial Waste Division of King County's Department of Natural Resources.

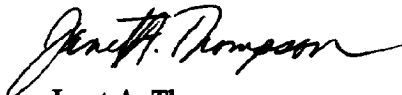
All projects or expansion disturbing five or more acres of soil will require coverage under the General Stormwater Permit for Construction Activity. The threshold of five acres will be lowered to one acre or more effective sometime in 1998, corresponding to the changes in EPA's proposed stormwater regulations, which are scheduled to be published November 25, 1997.

Noise Issues

Noise is a significant environmental issue that needs to be better addressed during the environmental review process. The current scope of the noise issue and its impacts are unknown. Noise impacts needing to be addressed in the EIS include the cumulative impacts of noise from KCIA and SeaTac operations. KCIA's impacts are much broader than the boundaries of the airport and the immediate communities since many of the larger aircraft coming into Boeing field must come in at a lower altitude in order to be clear of SeaTac traffic. Any noise study should include all those parts of the City of Seattle from which KCIA has received complaints of aircraft noise.

Once again, thank you for giving us the opportunity to comment. If you have any questions regarding our comments or if I can be assistance in helping navigate through the SEPA process, please call me at (425)649-7128.

Sincerely,



Janet A. Thompson
Senior Environmental Planner

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